ROALD HAESTAD, INC.

Consulting Engineers -

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January 21, 2010

Department of Environmental Protection Bureau of Water Protection and Land Reuse Planning and Standards Division 79 Elm Street Hartford, CT 06106-5127

Attention:

Paul E. Stack

Re: Stream Flow Standards and Regulations

Gentlemen:

The following are my questions and comments on the proposed Stream Flow Standards and Regulations.

- 1. How are releases to be made from reservoirs that are in more than one watershed? Examples of this would be Merimere Reservoir in the Quinnipiac River and Mattabasset River watersheds, and Margerie Reservoir in the Still River and Ball Pond Brook watersheds.
- 2. Are internal diversions within larger watersheds required to make releases? Meriden has several small diversions, generally less than 0.2 square miles, within the reservoir watersheds. The releases would be insignificant and difficult to monitor.
- 3. There should be a minimum watershed area below which releases are not required. In most cases, the natural low flows for these small watersheds would be zero. Providing release facilities and monitoring the releases would not be practical. One leaf would obstruct a small outlet. I would recommend that diversions less than 1.0 square mile be exempt from any release.
- 4. Daily records and reporting should not be required for fixed releases. Many sites are remote from power sources for recording equipment. Visiting sites daily to record small flows would be unnecessarily burdensome.
- 5. Does the current Quinnipiac River Flow Monitoring Program qualify under exemption 15? It appears to meet the requirements.

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Stream Flow Standards and Regulations January 21, 2010

6. Do the reduced stream flow releases during droughts under Sec. 26-141b-6(a)(4) apply to fixed releases from small watersheds?

Respectively submitted

ROALD HAESTAD, INC.

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Vice President

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